

MARGO A. RAISON, COUNTY COUNSEL
Robert J. Rice, Deputy
By: Andrew C. Hamilton, Deputy (SBN 299877)
Kern County Administrative Center
1115 Truxtun Avenue, Fourth Floor
Bakersfield, CA 93301
Telephone 661-868-3800
Fax 661-868-3805

Attorneys for Kern County Sheriff's Office, Craig, and Doe 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JANE DOE,) Case No.: 1:20-CV-01544-JLT
)
Plaintiff,) STIPULATION FOR
v.) MENTAL/PHYSICAL EXAMINATION;
) [PROPOSED] ORDER
KERN COUNTY SHERIFF'S OFFICE,) (Doc. 29)
THOMAS CRAIG, DOE 1 OROZCO,)
DOES 2-20,)
)
Defendants.)
)

IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES through their respective counsel, pursuant to Rules 29 and 35 of the Federal Rules of Civil Procedure as follows:

1. Date and Place: Plaintiff Jane Doe will produce herself for a mental examination at the request of Defendant County of Kern as follows:
 - (a) Date: January 8, 2022
 - (b) Time: 10:00a.m.
 - (c) Location: Wood & Randall
900 Truxtun Avenue, Ste. 320
Bakersfield, CA 93301
 - (d) Examiner: Plaintiff shall be examined by Dr. Kambam, board certified in Forensic Psychiatry.

2. Manner, Conditions, Scope and Nature of the Examination: Plaintiff will be seen at the location set forth above by the examining psychiatrist, who will conduct an examination consisting of: (1) a clinical interview; (2) taking a comprehensive psychiatric history; (3) conducting psychological tests (MMPI-2 or MMPI-3, and a TSI-2) and (4) administering a mental status examination. The duration of the mental examination shall be no more than seven (7) hours exclusive of breaks. Dr. Kambam will meet with and interview plaintiff in an office or conference room setting. The interview will consist of Dr. Kambam asking questions and plaintiff providing answers. Dr. Kambam will take a psychiatric and medical history as well as a childhood/developmental history and social/occupational history from plaintiff, will discuss her social functioning, parental functioning, family psychiatric history, current psychological/social/occupational functioning and will also discuss past experiences which may have contributed to her current mental status and will ask specific questions regarding plaintiff's mental function.

3. Good cause exists for this examination.

4. The costs of this examination, including the fees of the examiner(s), will be borne by the County of Kern.

5. If Plaintiff requests a copy of the examination report, County of Kern will supply a truly conformed copy of the report and all other reports of the same condition authored by anyone, without any further demand on the availability of such report(s).

6. The court may issue an order upon the filing of this stipulation without notice or hearing.

Dated: December 8, 2021

LAW OFFICES OF PHILLIP GANONG

By: /s/ Phillip Ganong
Phillip Ganong
Attorney for Plaintiff
Jane Doe

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1 Dated: December 8, 2021

MARGO A. RAISON, COUNTY COUNSEL

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3 By: /s/ Andrew C. Hamilton

4 By: Andrew C. Hamilton, Deputy

5 Robert J. Rice, Deputy

6 Attorneys for Defendant County of Kern,

7 Thomas Craig and Doe 1

8 **ORDER**

9 The parties, through counsel, have submitted a stipulation for the plaintiff in this case.
10 This court, having reviewed the attached stipulation and good cause appearing therefor,
11 ORDERS the mental examination of the plaintiff as set forth above.

12 IT IS SO ORDERED.

13 Dated: **December 13, 2021**

/s/ Jennifer L. Thurston

14 CHIEF UNITED STATES MAGISTRATE JUDGE
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